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★ FEB 07 2020 ★

## Law Office of FELIX VINLUAN

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LONG ISLAND OFFICE

February 6, 2020

Hon. Gary R. Brown  
United States District Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: *Hannah Carillo et al. v. Ralph Colamussi et al.*  
17-cv-04926 (GRB) (AYS)

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Dear Judge Brown:

This law office represents the plaintiffs in the above case. Plaintiffs bring causes of action against defendants for violations of the Trafficking Victims Protection Act, as amended. Pursuant to the Court's Status Report Order on January 23, 2020, we make the following manifestations.

Plaintiffs filed this case on August 21, 2017. Summons was returned executed as to defendant Historical Thatched Cottage Caterers, Inc. on October 4, 2017, indicating that said defendant company was served through the Secretary of State on September 7, 2017. Through plaintiffs' cooperation and coordination with federal authorities, we learned that both individual defendants Ralph Colamussi and Roberto Villanueva were arrested sometime in December 2017. All three plaintiffs made themselves available to federal authorities to serve as witnesses against the individual defendants in the criminal matter, 17-cr-00592-DRH-AKT, likewise pending in this Court.

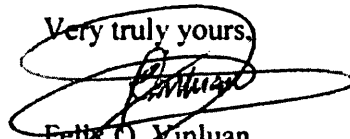
Because of the pendency of the criminal matter and because we learned that Colamussi had filed bankruptcy proceedings, plaintiffs decided to wait for the resolution of the criminal matter before assessing the propriety of moving forward in this civil matter.

On September 26, 2018, defendant Colamussi pled guilty before Judge Denis R. Hurley to forced labor of employees at the Thatched Cottage. Yesterday, February 5, 2020, defendant Roberto Villanueva pled guilty before Magistrate Judge Anne Y. Shields to forced labor conspiracy and forced labor of employees at the Thatched Cottage. According to the press releases of the U.S. Attorney's Office of the Eastern District of New York, each individual defendant, when sentenced, faces up to 20 years in prison, as well as restitution and a fine of up to \$250,000 on each count.

Defendant Colamusi's sentencing has been adjourned to May 15, 2020. As for defendant Villanueva, there is no date yet when he is going to be sentenced.

At present, plaintiffs are happy to know that both individual defendants had pled guilty to basically the same labor trafficking charges they brought in this civil matter. They need more time to evaluate whether to proceed forward with their damages case, inasmuch as they knew both defendants would more likely spend time in jail and would probably have no more financial resources. In light of these above manifestations, plaintiffs, through undersigned counsel, would like the Court to stay this civil matter until after the defendants shall have been sentenced, which hopefully, should be soon.

We thank your Honor for your consideration of this matter.

Very truly yours,  
  
Felix Q. Vinluan  
Counsel for the plaintiffs

CASE STAYED PENDING RESOLUTION OF CRIMINAL  
PROCEEDINGS. PLAINTIFFS COUNSEL SHALL FILE A  
FURTHER STATUS REPORT ON 5/29/2020.

SO ORDERED.  
DATED: 2/7/2020

/S/ GARY R. BROWN  
GARY R. BROWN, U.S.D.J

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